

Remarks/Arguments

In an Office Action dated October 3, 2003, the Examiner allowed Claims 13-22. For this reason, the following remarks do not apply to Claims 13-22.

Only two claims stand rejected, namely Claims 9 and 12. Claim 9 has been amended to move a limitation that was previously recited in the preamble into the body of the claim.

Claim 9 is believed to be patentable for a number of reasons discussed below. Note that Claim 9 explicitly recites that it is the "first" plugs that are being rotated and that it is the "second" plug that is being unplugged. Hence, it is to be noted that in accordance with Claim 9, rotation is to be done on plugs which are not being unplugged. Such rotation is nowhere disclosed or suggested in the only reference cited against Claim 9, namely U.S. Patent 5,788,531 granted to Wright et al. At most Wright et al. may be interpreted to suggest that a plug that is itself to be removed is being rotated, there is certainly no suggestion whatsoever that other plugs should be rotated.

In rejecting Claim 9, the Examiner explained her rejection at page 2, paragraph 2 of the above-identified Office Action as being based on a combination of the teachings of U.S. Patent 5,788,531 in view of applicant's admitted prior art. Regarding the teachings of U.S. Patent 5,788,531, the Examiner stated:

Wright et al. disclose a method for dismounting plugs from a printed circuit board, wherein each of the plugs comprises a main body 106,108, and a wire exit 114,116 extending approximately 45 degrees from the main body, the method comprising rotating a first plug so that each first plug wire exit does not interfere with a second plug and unplugging the second plug from a

printed circuit board (not shown, see col. 4, lines 39-44)
without affecting the first plug.

The Examiner also stated that Wright et al. did not disclose having more than two plugs and arranging the plugs in a two dimensional array. To overcome this defect in the teaching of Wright et al., the Examiner relied on applicant's description at page 2, lines 6-18. Please note that page 2, lines 6-18 of the originally-filed application contain the summary of the invention. To the extent the Examiner relies on Applicant's invention summary to reject Claim 9, the Examiner has failed to make a prima facie case of rejection.

Applicant also respectfully traverses the Examiner's remarks about the teachings of Wright et al. for the following reasons. First, note that the Examiner stated that Wright et al. disclose "the method comprising rotating a first plug..." (in the middle of the above-quoted text). Applicant has carefully reviewed the entire teachings of U.S. Patent 5,788,531, and is unable to find a single location where Wright et al. explicitly teach rotating of plugs during dismounting.

Moreover, as seen from the above-quoted text, the Examiner has not indicated by column number and line number as to where in Wright et al. has the Examiner found that the "rotation" limitation of Claim 9 is disclosed. The only citation by the Examiner was to col. 4, lines 39-44 of Wright et al., which merely discloses a printed circuit board but does not disclose any "rotation" whatsoever.

The Examiner appears to have ignored the following request at the top of page 10 in the prior Amendment: "If the Examiner rejects Claim 9 in a future Office Action, Applicant respectfully requests the Examiner to provide a detailed explanation by identifying each limitation of Claim 9 in the cited prior art." This is clear error per MPEP 707.07(f) which states "Where the applicant

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traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it." **The Examiner has failed to cite even a single line in a single column of Wright et al.** for teaching any rotation of plugs for dismounting.

Second, Wright et al. teach opposite to the Examiner's remark that the claimed "rotation" is disclosed by Wright et al. Specifically, Wright et al. illustrate an open region 26 (see FIG. 6 of Wright et al.) to constrain rotation of clamp means 114, 116. Moreover, Wright et al. state that "The bent portion of the cables 110, 112 and respective clamp means 114, 116 will extend out of respective open regions 26. ... In particular, if the bent portions of the cable and clamp means are not in alignment with the respective open regions 26, such bent portions will engage respective ends 16 of respective segments 12 to impede insertion of the male connectors into the female connectors. ..." (see column 4, lines 55-64). Wright et al. further state "rotation ... in circumferential direction ... will be impeded ..." (see column 5, lines 1-8). Applicant submits that the Examiner cannot simply ignore the **repeated teaching away** by Wright et al., especially when the rejection of Claim 9 is under 35 U.S.C. § 103. The Examiner's failure to provide any rationale as to why this explicit teaching by Wright et al. is to be disregarded is another clear error.

Third, Applicant submits that the Examiner has failed to cite any prior art in support of the Examiner-stated motivation/suggestion to modify Wright et al. The Examiner simply extended the teachings of Wright et al. to more than two plugs and to a two dimensional array, without addressing **a problem with Examiner's modification of Wright et al.**, namely the interference by surrounding plugs during rotation. Specifically, the Examiner has not explained why, before the dismounting of a plug in a two dimensional array, it

is the other plugs that should be rotated. Nothing in Wright et al. appears to suggest the rotation of adjacent plugs.

In view of the above remarks, the Examiner has not made a convincing obviousness case for the rejection of Claim 9 over the teachings of Wright et al. and Applicant's Description of Related Art. Hence Claim 9 and its dependent Claim 12 must be allowed, at least in view of the prior art currently of record.

Moreover, there appears to be no support in Wright et al. for the Examiner's statement that wire exit 114,116 extends approximately 45 degrees from main body 106, 108 (see above-quoted text). Instead, Wright et al. shows clamp means 114 at 90° to male connector 106 (see FIG. 6) and clamp means 116 also at 90° to male connector 108 (also in FIG. 6). Applicant notes that this remark by the Examiner is no longer applicable to Claim 9 because the 45° angle is now recited in newly added Claim 24. Applicant notes that **none of the figures of Wright et al. shows 45° angle** between clamp means 114,116 and male connector 106,108.

In the absence of disclosure of 45° angle explicitly by Wright et al., there is no statement (in the above-quoted remark) that the Examiner is relying on inherency. Even assuming the Examiner is relying on inherency, the Examiner has not shown that a 45° angle necessarily follows from the disclosure of Wright et al. In this context, note that Wright et al. state, at column 4, lines 37-39 that "cables 110, 112 and the clamp means 114,116 are bent at about 90° although such bend may be more or less if desired." While the language "more or less" in the just-quoted text of Wright et al. may be interpreted as a reasonable deviation from the 90° angle, there is no suggestion by Wright et al. that the angle should be made half of the 90° angle, i.e. 45°. If the Examiner takes the position that 45° is "more or less" "about 90°" as stated by Wright et al. then there appears to be no boundary to

the disclosure of Wright et al. i.e. even 0° could be "more or less than" about 90°.

Applicant submits that all pending claims are in form for allowance, and allowance thereof is respectfully requested.

If the Examiner's action is other than allowance, then prior to issuance of an Office Action on the RCE, Applicant hereby **respectfully requests an Examiner Interview** by telephone conference (with the inventor and the undersigned attorney), to discuss the claims and arguments being presented herein. To set up the Interview, please call the undersigned at (408) 982-8200, ext. 3.

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Respectfully submitted,



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